

REMARKS

This paper is responsive to the Office Action of January 10, 2008. Applicants respectfully traverse all rejections of the Examiner. Reconsideration and further examination is respectfully requested.

Applicants wish to thank Examiner Winter for his helpfulness in telephone conversations with the undersigned Attorney on July 8 and July 10. Examiner Winter indicated that subject to further consideration and search, the present amendments appear to overcome the currently cited references.

The present claim amendments are intended to clarify and more precisely claim the present invention. Support for the present claim amendments is found throughout the Specification as originally filed. For example, support for the present claim amendments is found in lines 4-29 on page 3, and in lines 11-25 on page 12. No new matter has been added.

In the Office Action, the Examiner made final the requirement of restriction to on of Invention I or Invention II. Applicants hereby affirm election of Invention I, and have canceled claims directed to Invention II herein.

Claims 3-5, 9, and 19 stand rejected for obviousness under 35 U.S.C. 103 based on the combination of U.S. patent 6,792,145 (“Gay”) and U.S. patent 5,903,646 (“Rackman”). Applicants respectfully traverse this rejection.

Gay discloses extracting textual as well as tabular data material from a financial document, and a comparison made to determine the type of data schedule material provided in the document. Subsequently, Gay compares the character strings of the financial document to character strings provided in previous documents or in various databases. The database of the

previous document in Gay includes the textual material in a first plane, and the tabular material also in that first plane. If a character string match is made between a new document and an old document, Gay teaches that the new tabular data material would be provided in a data matrix in a second plane but the corresponding textual material would not be included in the textual matrix provided in that second plane.

Rackman discloses an access control system for litigation document production. Documents in Rackman are produced as stored images on an optical disk, and documents which are to be redacted or maintained confidential are stored in encrypted form. Rackman teaches that as the litigation progresses, access by the opposing counsel/party to additional documents can be effected by distributing appropriate decryption keys.

Nowhere in the combination of Gay and Rackman is there disclosed or suggested a method comprising:

- (A) *creating a shadow document from an original document, wherein the original document is an electronic mail message within a conversation thread of electronic mail messages*, parsing the original document for selected logistical data comprising any of sender, receiver, original size, subject, or carbon copies of the original document, and storing the logistical data in the shadow document;
- (B) *identifying, within the conversation thread of electronic mail messages, a parent document and a child document of the original document, wherein the original document is a reply to the parent document of the original document and wherein the child document of the original document is a reply to the original document, and storing references thereto in the shadow document*; and
- (C) storing the shadow document in a computer usable memory, and determining and *visually rendering a complete tree representing the conversation thread of electronic mail messages responsive at least in part to the shadow document subsequent to deletion of the original document*. (emphasis added)

as in the present independent claim 3. In contrast, Gay teaches a technique for ensuring that a date of a document is valid from line 26 in column 27 through line 10 in column 8, and Rackman describes counting pages in a document by determining the start of a scan of a new document in

lines 15-46 in column 8. Neither Gay nor Rackman includes any hint or suggestion of even the desirability of *creating a shadow document from an original document, wherein the original document is an electronic mail message within a conversation thread of electronic mail messages, identifying, within the conversation thread of electronic mail messages, a parent document and a child document of the original document, wherein the original document is a reply to the parent document of the original document and wherein the child document of the original document is a reply to the original document, and storing references thereto in the shadow document*, as in the present independent claim 3.

Independent claim 9 also stands rejected over Gay and Rackman. It should be understood from the above discussion regarding independent claim 3 that the combination of Gay and Rackman also does not disclose or suggest all the features of the present independent claim 9, since the combination of Gay and Rackman does not disclose or suggest *creating a shadow document from an original document, wherein the original document is an electronic mail message within a conversation thread of electronic mail messages, identifying, within the conversation thread of electronic mail messages, a parent document and a child document of the original document, wherein the original document is a reply to the parent document of the original document and wherein the child document of the original document is a reply to the original document, and storing references thereto in the shadow document*.

Independent claim 19 also stands rejected over Gay and Rackman. It should be understood from the above discussion regarding independent claim 3 that the combination of Gay and Rackman also does not disclose or suggest all the features of the present independent claim 19, since the combination of Gay and Rackman does not disclose or suggest *creating a shadow document from an original document, wherein the original document is an electronic mail*

message within a conversation thread of electronic mail messages, identifying, within the conversation thread of electronic mail messages, a parent document and a child document of the original document, wherein the original document is a reply to the parent document of the original document and wherein the child document of the original document is a reply to the original document, and storing references thereto in the shadow document.

For the reasons stated above, Applicants respectfully urge that the combination of Gay and Rackman does not disclose all the features of independent claims 3, 9 and 19. Accordingly, Gay and Rackman support a *prima facie* case of obviousness under 35 U.S.C. 103 with regard to independent claims 3, 9, and 19. As to claims 4-5, they each depend from the previously discussed independent claims, and are respectfully believed to be patentable over the combination of Gay and Rackman for at least the same reasons.

Claims 13-16 stand rejected for obviousness under 35 U.S.C. 103 based on the combination of Gay, Rackman, and U.S. patent application publication 2004/0205535 (“Newman et al.”). Applicants respectfully traverse this rejection.

Newman et al. discloses a method for display of tree-structured information in a "treetable" that is a table-like display structure, in which each path from a root to a leaf node is represented by a single column, and cells representing the immediate successors of a node are placed immediately under that node. Variation in the amount of space given to cells within particular columns of the Newman et al. display structure is used to allow more detail to be given for selected paths and subtrees. Newman et al. further teach that extraction of subparts of a treetable into another such structure may be used for deeper exploration of trees.

Nowhere in the combination of Gay, Rackman and Newman et al. is there disclosed or suggested a method comprising:

(A) *creating a shadow document from an original document, wherein the original document is an electronic mail message within a conversation thread of electronic mail messages*, parsing the original document for selected logistical data comprising any of sender, receiver, original size, subject, or carbon copies of the original document, and storing the logistical data in the shadow document;

(B) *identifying, within the conversation thread of electronic mail messages, a parent document and a child document of the original document, wherein the original document is a reply to the parent document of the original document and wherein the child document of the original document is a reply to the original document, and storing references thereto in the shadow document*; and

(C) storing the shadow document in a computer usable memory, and determining and *visually rendering a complete tree representing the conversation thread of electronic mail messages responsive at least in part to the shadow document subsequent to deletion of the original document*. (emphasis added)

as in the present independent claim 3. In contrast, Newman et al. teaches away from any kind of display of a complete tree representing a conversation thread of electronic mail messages, since Newman et al. teach displaying a table-like “treetable” structure (Fig. 1, Newman et al.), and neither Gay nor Rackman disclose or suggest a conversation thread of electronic mail messages. Accordingly, the combination of Gay, Rackman and Newman et al. fails to disclose or suggest all the features of the present independent claim 3, from which claims 13-16 depend. The combination of Gay, Rackman and Newman et al. therefore does not support a *prima facie* case of obviousness with regard to independent claim 3, and claims 13-16 are respectfully believed to be patentable over the combined references for at least the same reasons.

Applicants have cancelled claims and amended claims. Applicants are not conceding in this application that unamended claims are not patentable over the art cited by the Examiner, as the present claim amendments are only for facilitating expeditious prosecution of allowable subject matter. Applicants respectfully reserve the right to pursue the unamended claims in one or more continuations and/or divisional patent applications.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned, Applicants' Attorney at 617-630-1131 so that such issues may be resolved as expeditiously as possible.

For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

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Date

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